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February 28, 2023

VIA ECF

The Honorable Jesse M. Furman USDJ
United States District Court
Southern District of New York
40 Centre Street, Room 2202
New York, NY 10007

Re: Sari E. Newman v. JPMorgan Chase Bank, N.A.
Docket No.: 1:22-cv-06948-JMF

Dear Judge Furman:

This firm represents defendant JPMorgan Chase Bank, N.A. (“Chase”). The parties submit this joint letter seeking a 60 (sixty) day extension of all discovery deadlines in this matter. Plaintiff filed amended her amended complaint on or about December 29, 2022 which sought damages for emotional distress. In response to Chase’s discovery demand, she provided a complete Authorization for Release of Health Information Pursuant to HIPAA on February 8, 2023. The authorization was sent to the provider on or about February 9, 2023 and my office is following up for the responsive records.

My office also had subpoenas served upon Coastal Community Bank and Aspiration Financial LLC (“Aspiration”) as they possess information critical to the litigation. Coastal Community Bank responded that it does not have access to the information sought as it is in the control of Aspiration. We are following up with Aspiration for its response. The responses from the provider and Aspiration are necessary to discovery.

The current discovery schedule, which was set before plaintiff amended her complaint to seek damages for emotional distress, provides for fact discovery to conclude on March 17th and for expert discovery to conclude on May 2nd. A pretrial conference is scheduled for March 30th. This is the first extension request.

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Thank you for your consideration.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "M. Tarson", with a long horizontal flourish extending to the right.

Michelle E. Tarson

MET/bv

cc: Shimshon Wexler, Esq. (Via ECF)
Justin Baxter, Esq. (Via ECF)
Attorneys for Plaintiff